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2020 FEB -5 P 3:09

POSTAL REGULATORY
COMMISSION
U.S. DEPARTMENT OF JUSTICE

January 27, 2020

Postal Regulatory Commission
901 New York Avenue, NW
Suite 200
Washington, DC 20268

Re: Docket RM2017-3

Dear Commissioners:

I am writing on behalf of Americans United for Separation of Church and State, its Board of Trustees, and its national network of over 300,000 members and supporters in response to your proposal as a part of the Ten-Year Rate Review process to remove the Consumer Price Index (CPI) cap that now governs postage rates. The new formula proposed represents potential volatile postage price hikes that range from 28% - 40% or more over the next five years. We strenuously oppose this action, strongly urge you to reconsider this decision and are writing to tell you why this would drastically impact our mission.

Americans United is a national nonpartisan educational and advocacy organization dedicated to advancing the separation of religion and government as the only way to ensure freedom of religion, including the right to believe or not believe, for all. As a nonprofit mailer, direct mail is a critical component of our fundraising program – and therefore, our mission – which allows us to use high-impact litigation, powerful lobbying and grassroots advocacy to ensure that religion does not dictate public policy, the government does not tell Americans what to believe or how to practice their faith and that discrimination is not justified under the guise of religion. Approximately 56% of our annual income is generated from direct mail fundraising.

If the CPI capped rate making system were to change to the new proposed system the USPS is contemplating, the consequence our constituents will ultimately bear is tangible. This postage increase would reduce our ability to communicate with our donors and generate revenue for Americans United. If we cannot raise funds through the mail, we will not be able to fight the myriad threats across the country in the courts, in state legislatures or in Congress.

We believe the instability in postage costs presents an opportunity for our program to become overwhelmed and unsustainable. We have invested time and money to develop a mail fundraising program that meets current standards, is fiscally sound and is prepared for modest price increases. Annually, our organization spends more than \$250,000 on postage. We have relied on the Postal Service's CPI capped rate increases to balance our fundraising budget and to plan for stability in the future. The sudden rate hikes that this rule change could represent would cripple our mailing programs. The USPS says it is our partner but springing a wholesale and drastic

change such as contemplated here does not demonstrate collaboration. It is not how partners treat each other.

In conclusion, we would suffer substantial lost revenue and a consequential loss of resources for our programs and communities we serve across the country. Unpredictable rate increases would lead to a further migration from mail to alternative means of fundraising and membership development. In terms of our fundraising mix, hard-copy USPS mail outperforms many digital options. Direct mail is a powerful fundraising tool, and we want to continue to utilize this tool in the future. We, like other nonprofit mailers, have long relied on our partnership with the Postal Service. We urge you to justify our reliance by declining to move this proposal any further.

Sincerely,

A handwritten signature in blue ink that reads "Rachel K. Laser". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Rachel K. Laser
President & CEO